

INTERNATIONAL ASSOCIATION FOR BEAR RESEARCH AND MANAGEMENT

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c/o Alaska Dept. Fish and Game
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Nov. 31, 1997

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RECEIVED BY U.S. FISH
AND WILDLIFE SERVICE
GRIZZLY BEAR RECOVERY
COORDINATORS OFFICE.

DEC 07 1997

RE: Comments on the DEIS for Bitterroot Grizzly Bear Recovery

Dear Dr. Servheen:

The International Association for Bear Research and Management (IBA) is an organization of some 650 members from around the world. Most of our members are professional biologists working on bear management and research issues, but our membership also includes non-biologists who are committed to a professional approach to bear management issues. Most of our members work for universities, state, federal, or provincial governmental agencies, or NGOs. Our Association holds a scientific conference every three years, usually with sessions in Europe as well as North America, and publishes the peer-reviewed proceedings in the series entitled *Bears—Their Biology and Management*.

The IBA strongly supports reintroduction of grizzly bears into the Selway-Bitterroot Wilderness areas of Idaho and western Montana. This area is the largest contiguous area of suitable habitat remaining in the lower 48 states that does not currently have grizzly bears. We believe that reintroduction of grizzly bears into this habitat would be successful from the standpoint of people who are using this area for a variety of purposes and from the standpoint of the bears. We also believe that a successful reintroduction into this area will provide a valuable model that will permit additional reintroduction efforts to proceed elsewhere.

The draft EIS includes 2 alternatives which our organization supports. Both of these alternatives have strengths and weaknesses and both have a probability of success in accomplishing the objective of reestablishing a viable population of grizzly bears in western Montana and central Idaho. Our governing Council was not unanimous in their views on which alternative offered the better probability of success.

Alternative 4, the "conservation biology" alternative, is the strongest alternative from the purely biological perspective. Bears introduced under the terms of this alternative would have full protection offered by the Endangered Species Act (ESA). If it could be implemented, our Council agrees that this protection would give the bears the best chance of successfully establishing a viable self-sustaining population and would do this in the shortest period. Two of the members of our governing Council (Harry Reynolds and Ivar Myrsterud) voted for an IBA endorsement of this alternative. The remaining members of our Council believed that political and economic opposition to Alternative 4 would likely prevent it from being implemented; these members voted to endorse Alternative 1 although they had some reservations about this alternative.

Alternative 1, the "preferred alternative" in the draft EIS represents a reasonable attempt to accommodate local concerns that would likely prevent the grizzly reintroduction efforts from being implemented in the view of the majority of the members of our governing Council. Under Alternative 1, the introduced bears would be treated as an "experimental non-essential population"

and would not be afforded full protection as an endangered species under ESA. This approach has been successfully used in reintroductions of other populations of endangered large carnivores such as red wolves in North Carolina and timber wolves in Yellowstone. This approach has been proven effective in reintroduction efforts for disparate species from black-footed ferrets to condors (in Arizona). Based on the proven track record of this "experimental" approach and our recognition that compromises need to be made to overcome social and political objections to grizzly reintroductions under full protection of ESA, 8 members of our governing Council (Sterling Miller, Mike Pelton, Mike Vaughan, Kate Kendall, Djuro Huber, H  len   Jolic  ur, John Beecham, and John Schoen) voted to endorse Alternative 1. However, these members have reservations about the Citizen Management Committee (CMC) approach outlined in Alternative 1.

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To our knowledge the appointment of a CMC with regulatory authority to manage resident species of wildlife has not been tried before. As long as the individuals appointed to this committee by the Secretary of Interior, based on the nominations proposed by the Governors of Idaho and Montana, have a strong commitment to the success of the reintroduction effort, this approach could be effective at reducing local concerns over grizzly bear management. However, creation of another organization with mixed regulatory and advisory mandates over a very narrow range of resource management issues, will further complicate a situation where there are already frequently differing state and federal management objectives. Correspondingly, if the CMC approach turns out to be ineffective in obtaining recovery of this population, then we would urge the Secretary of Interior to speedily explore other options for grizzly management authority in the Bitterroot recovery area. These options would include both resumption of management under federal authority and transfer of management authority to a group of state and federal resource management professionals. Under these circumstances the CMC could retain a strong advisory role. Because we think the CMC should be given every opportunity to be a successful model for local involvement in issues like this, we further recommend that the Secretary be required to appoint at least 2 scientists considered experts in bear management issues to the 15 member CMC. These experts should, preferably, not be employees of federal agencies and could be drawn from lists of experts submitted by state management agencies and NGOs. Our organization would be pleased to nominate well-qualified scientists to serve in this capacity.

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We further believe it is important to include as much acceptable habitat as possible in the delineated recovery area for the introduced population. Under Alternative 1 the designated area for recovery is limited to established areas designated as wilderness. Expansion of the recovery area will permit more full exploitation of the management flexibility permitted under the experimental population approach of Alternative 1. For this reason we recommend including the important habitats on public lands north of the Lochsa River in the Clearwater drainage as part of the delineated recovery area.

We believe that the grizzly is an important native species in the Bitterroot ecosystem. We will support and assist in all efforts designed to reestablish a viable population of this species in this area. We are certain that grizzly bears and humans can and should coexist in this area. As researchers and managers of bear populations we know that problems or conflicts that may arise can be managed here as they are elsewhere. The Bitterroot represents the best area south of Canada where grizzly bears could be successfully reintroduced. Our organization will be pleased to advise and assist the process of accomplishing this worthwhile objective.

Thank you for this opportunity to comment.

Sincerely,


Sterling Miller, President